

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

RONALD A. KATZ TECHNOLOGY  
LICENSING, L.P.,

Plaintiff,

V.

TD BANKNORTH INC., *et al.*,

Defendants.

C.A. No. 06-544 (GMS)

**COMERICA'S REPLY BRIEF IN FURTHER SUPPORT OF ITS  
MOTION TO STAY ACTION PENDING THE U.S. PATENT AND  
TRADEMARK OFFICE'S RE-EXAMINATION OF PLAINTIFF'S PATENTS**

Paul J. Lockwood, I.D. No. 3369  
SKADDEN, ARPS, SLATE,  
MEAGHER & FLOM LLP  
One Rodney Square, P.O. Box 636  
Wilmington, DE 19899  
Tel.: (302) 651-3000  
Fax: (302) 651-3001

Daniel A. DeVito  
Guy Perry  
Marti A. Johnson  
SKADDEN, ARPS, SLATE,  
MEAGHER & FLOM LLP  
New York, NY 10036  
Tel.: (212) 735-3000  
Fax: (212) 735-2000

Dated: February 7, 2007

On December 27, 2006, Defendants Comerica Incorporated, Comerica Bank & Trust, National Association and Comerica Securities, Inc. (collectively, "Comerica") respectfully moved the Court to stay this action pending the re-examination of certain of the patents in suit by the U.S. Patent and Trademark Office. In its motion, Comerica incorporated by reference the Motion to Stay and Memorandum and Declaration in Support filed by the Qwest Defendants in Civil Action No. 06-546 (GMS). (C.A. No. 06-546 (GMS), D.I. 80-82.) In further support of its motion, Comerica hereby incorporates by reference the Qwest Defendants' Reply Brief in Support of Their Motion to Stay, filed on February 2, 2007. (C.A. No. 06-546 (GMS), D.I. 87.)

For all of the reasons cited in its Motion to Stay and for all of the reasons cited in the Qwest Defendants' Motion to Stay and Memorandum and Declaration in Support and in the Qwest Defendants' Reply Brief in Support, which Comerica incorporates by reference, Comerica respectfully requests that this Court exercise its discretion to stay this case pending reexamination of plaintiff's patents.

DATED: February 7, 2007

Respectfully submitted,

/s/ Paul J. Lockwood  
Paul J. Lockwood, I.D. No. 3369  
SKADDEN, ARPS, SLATE, MEAGHER &  
FLOM LLP  
One Rodney Square,  
P.O. Box 636  
Wilmington, DE 19899  
Tel.: (302) 651-3000  
Fax: (302) 651-3001

Daniel A. DeVito  
Guy Perry  
Marti A. Johnson  
SKADDEN, ARPS, SLATE, MEAGHER &  
FLOM LLP  
New York, NY 10036  
Tel.: (212) 735-3000  
Fax: (212) 735-2000

*Attorneys for Defendants  
Comerica Incorporated, Comerica Bank &  
Trust, N.A. and Comerica Securities, Inc.*